

Regulatory Unit

Monthly Performance Report

February 2000

**Office of Safety
Regulation of the
TWRS
Privatization
Contractor**

Richland Operations
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EXECUTIVE OVERVIEW

EXECUTIVE SUMMARY

The Regulatory Unit (RU) continues to work with BNFL to resolve three significant issues prior to proceeding with Part B-2: authorization basis (AB) maintenance, dose assessment methodology, and adherence to procedures.

The establishment of an effective process for maintaining the TWRS-P authorization basis continues to be a significant unresolved regulatory issue. BNFL provided a revised response to RU inspection findings related to the authorization basis management process in a letter dated February 24, 2000. The RU met with BNFL management to discuss proposed BNFL corrective actions and is reviewing the revised response. By mid-March a decision will be made by the RU if additional action is warranted.

The RU continues to work with BNFL to correct deficiencies in the dose assessment methodology. The proposed methodology submitted by BNFL in October 1999 was missing necessary detail that would not become known until the Construction Authorization Request (CAR) was submitted. BNFL resubmitted their dose assessment methodology on February 25, 2000 and the RU is evaluating the submittal. It is anticipated that this issue will be resolved in late March.

Nearly all of the design phase RU inspections of BNFL have identified procedure compliance problems. To address this concern, BNFL established a team to determine the root causes of this problem. The results were presented to the RU management team during a workshop session, and a second response was issued to the RU on February 25, 2000 to address the problem. The second response included a Response to Finding that addresses remedial (near-term) actions for the specific deficiencies noted in the finding, taking into account the concerns noted by the RU in their February 8, 2000 letter. In addition, BNFL has addressed the corrective actions for root causes believed to be at the heart of this finding.

MONTHLY HIGHLIGHTS

Inspections

The RU performed a second inspection of the BNFL's Employee Concern Program (ECP), and did not identify any Findings. The inspection indicated that the contractor had implemented an effective Employee Concern Program as required by the Contract. The ECP's ability to resolve concerns is still untested since no concerns have been identified to date. The previous inspection concluded that an Employee Concerns Program had not been implemented. The Employee Concern Program Inspection Report was issued in March.

Development of construction inspection procedures is underway with ten of the forty procedures required for the Limited Construction Authorization/Construction Authorization completed.

Integrated Safety Management Reviews (ISM Cycle II)

RU observation of BNFL Integrated Safety Management (ISM) Cycle 2 activities is ongoing. Safety review meetings associated with hazard identification or control strategy selection for pretreatment of high and low activity waste vitrification systems continue to be held on a regular basis. The RU staff met to discuss observations from ISM meetings attended to date and to identify any negative trends or concerns. Some weaknesses in the BNFL ISM process were identified. The RU is preparing correspondence to BNFL transmitting these concerns.

Topical Meeting

The 16th Topical Meeting between the RU and BNFL was held to discuss the proposed electrical system design for the vitrification facility. The integrated safety management (ISM) process identified the electrical system as a key factor in facility safety.

Inspection Program Implementation Plan

The RU issued an update to the Inspection Program Implementation Plan (IPIP) for the Regulatory Oversight of the TWRS Privatization Contractor. The IPIP provides inspection-related administrative requirements; describes Inspection Program activities that are common to all phases of the TWRS-P Program; and identifies specific administrative and technical procedures used to implement the Inspection Program. This revision upgrades the IPIP to reflect the anticipated inspection program for the limited and full construction phases of the project.

Position Paper

The RU issued a Position on Acceptability of the TWRS-Privatization Dose Standards for Unlikely and Extremely Unlikely Events. The paper presented the results of a review of the acceptability of the radiation dose standards for postulated accidents at the proposed TWRS-P facility. These standards are part of a process used to ensure that the facility is provided with adequate structures, systems, and components that are important to safety. It is the RU position that the accident dose standards established in BNFL's Safety Requirements Document are appropriate as part of the contractual regulatory process that provides adequate safety for workers, co-located workers, and the public.

13th Quarterly

Dr. Clark Gibbs and Dr. Narinder Kaushal of the RU met with representatives of DOE Headquarters, the U.S. Nuclear Regulatory Commission (NRC), and the Defense Nuclear Facilities Safety Board in Washington D.C. to present the 13th quarterly briefing of regulatory activities in support of the BNFL TWRS-P Waste Treatment Plant (WTP). Topics presented included the following:

- Oversight of BNFL design review and integrated safety management activities
- Inspections performed and associated findings
- Results of Topical Meetings held with BNFL
- Implementation of industrial health and safety responsibilities
- TWRS-P WTP regulatory documents issued

- Developments in the revision of the memorandum of understanding between the DOE and NRC
- Regulatory Program funding requirements

No actions resulted from the briefing

External Independent Review

The External Independent Review (EIR) Team, which is assessing DOE's Readiness to Proceed with Phase I, Part B-2 of TWRS Privatization, gave their assessment following a week of data gathering. The EIR noted that the Office of River Protection (ORP), RL, and the RU had prepared well for their data-gathering visit, had strong management focus and had a high rate of progress in the past 60 days. The RU staff provided selected members of the EIR Team with a 30-minute opening presentation, participated in a 2-hour breakout session and provided an introduction to the RU Website. The EIR team had positive comments on the quality and content of the review guidance for the Construction Authorization Request and the content of the RU Website. The EIR will begin a detailed review of Phase I, Part B-2 Readiness on April 3, 2000.

FY 2002 Budget – EH-1 Concurrence and EM-1 Approval

By way of a memorandum from the RL Manager, the RU requested EH-1 concurrence with and EM-1 approval of its FY 2002 budget. In keeping with the provisions of the MOA and remaining consistent with past practices, EH-1 concurrence and EM-1 approval are needed for both the Program Direction (PD) and Program Support (PS) budgets for the RU. The reduction in FY 2002 to \$6.7M from the approved FY 2001 profile of \$9.1M stems primarily from the projected completion in FY 2001 of the Construction Authorization Request review, a thirty week effort requiring significant FTE resources; and the near-completion of the design review activities.

FY 2000 Rebaselining Effort

The RU conducted a detailed review of the resource requirements for the upcoming safety review activities. Utilizing the Regulatory Program's FYTD cost savings and realigning the currently known resources, the RU was able to adequately cover all projected resource needs throughout the review cycles. On February 25, 2000 the Regulatory Official approved the baseline change request.

Industrial Health and Safety Program

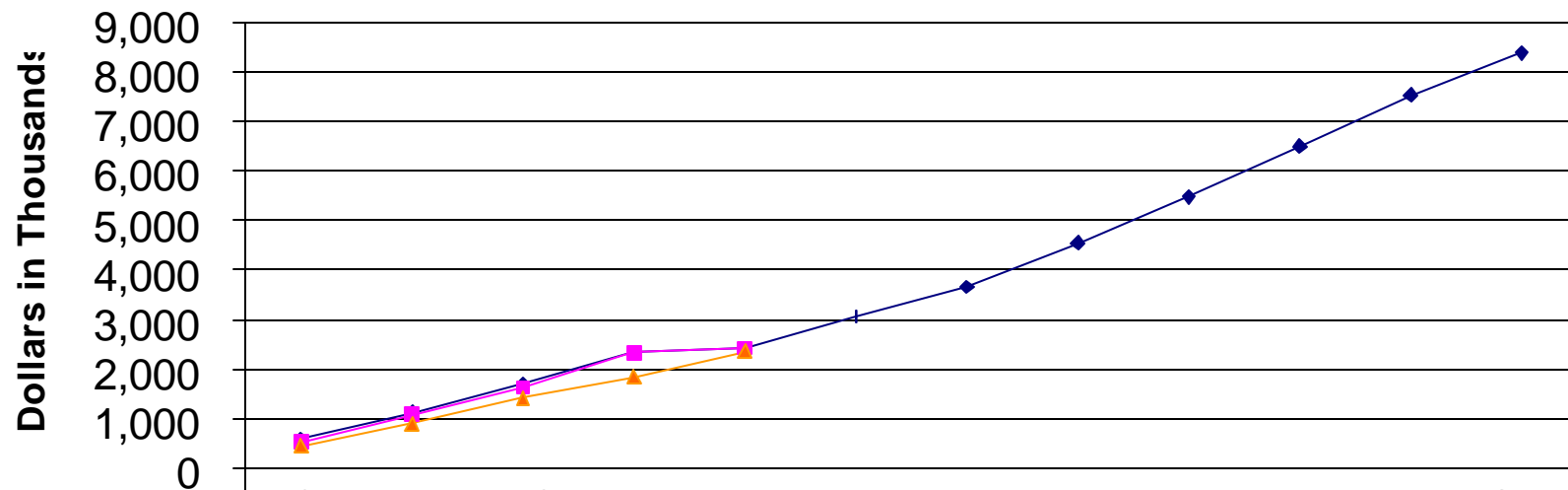
The RU is continuing to define a comprehensive program for regulating non-radiological worker safety and health. The status of the essential elements of this IH&S regulatory program are as follows:

- The Policy and Memorandum of Agreement (MOA) documents were modified to add the top-level framework for non-radiological safety regulation. The documents were reviewed internally and by HQ, and were modified per comments from Environmental Management (EM) and General Counsel.
- The RU's direction on design review (RL/REG-099-07) was revised to reflect IH&S considerations and will be reissued in March.
- The RU prepared a draft Regulatory Plan describing the processes it will follow internally in regulating

IH&S. The Regulatory Plan was sent to BNFL for review and comment in early March.

- The RU issued a position paper (revision 2) on regulating IH&S to BNFL for review and comment.
- BNFL continues to develop a description of their IH&S program for construction per the review guidance issued by the RU in January. BNFL is scheduled to submit the document on April 24, 2000.

The RU is developing an IH&S inspection program. The basic scope of the program was provided to BNFL as part of the draft Regulatory Plan.

COST PERFORMANCE (Graph)**Regulatory Unit Cost Performance**

	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
BCWS	585	1,131	1,694	2,333	2,425	3,068	3,657	4,544	5,478	6,489	7,535	8,370
BCWP	543	1,084	1,635	2,333	2,425							
ACWP	460	912	1,422	1,850	2,367							
SV	(42)	(47)	(59)	0	0							
CV	83	172	213	483	58							

COST PERFORMANCE SUMMARY

The fiscal year-to-date cost through February reflects a favorable cost variance of \$58K and is considered insignificant. All activities are currently performing on track or very close to the baseline schedule.

NEAR-TERM LOOK AHEAD

Planned Due Date

March

- Conduct Authorization Basis Corrective Action Meeting 3-01-00
- Conduct Training & Qualification Inspection 3-06-00
- Issue Employee Concerns Program Inspection Report 3-10-00
- Issue Non-Radiological Safety & Health Review Handbook 3-24-00
- Conduct Topical Meeting on LAW/HLW Melter Design & Safety Issues 3-28-00

April

- Issue Training & Qualification Inspection Report 4-07-00
- Issue QAPIP Review Handbook 4-07-00
- Conduct Corrective Actions Inspection 4-24-00
- Conduct Topical Meeting on Chemical Hazards 4-25-00
- Commence Review of BNFL IH&S Program Description 4-25-00

May

- Issue IH&S Regulatory Plan 5-11-00
- Issue SAP Review Handbook 5-12-00
- Commence Review of BNFL SAP 5-15-00
- Conduct Standards Implementation Inspection 5-15-00
- Issue LCA Review Handbook 5-17-00
- Present 14th Quarterly Briefing to Headquarters 5-18-00
- Conduct Topical Meeting on 2nd Iteration: Hazards Control Strategies 5-23-00
- Issue Corrective Action Inspection Report 5-30-00

PROGRAM PERFORMANCE OVERVIEW

PERFORMANCE SUMMARY (Chart) – Program Direction and Program Support

		STATUS thru February					FY 2000		
		BCWS	BCWP	ACWP	SV	CV	BAC	EAC	Delta
RU1	Program Management								
	Program Direction	496	496	501	0	(5)	1,290	1,290	0
	Program Support	664	664	633	0	31	1,882	1,882	0
	Total RU1	1,160	1,160	1,134	0	26	3,172	3,172	0
RU2	Regulatory Policy & Practices								
	Program Direction	51	47	47	(4)	0	105	105	0
	Program Support	94	93	98	(1)	(5)	371	371	0
	Total RU2	145	140	145	(5)	(5)	476	476	0
RU5	Recurring Safety Reviews								
	Program Direction	178	178	185	0	(7)	424	424	0
	Program Support	473	473	449	0	24	1,351	1,351	0
	Total RU5	651	651	634	0	17	1,775	1,775	0
RU6	Construction Authorization								
	Program Direction	49	52	47	3	5	440	440	0
	Program Support	67	69	54	2	15	1,485	1,485	0
	Total RU6	116	121	101	5	20	1,925	1,925	0
RU9	Oversight & Inspections								
	Program Direction	113	113	100	0	13	305	305	0
	Program Support	216	216	217	0	(1)	624	624	0
	Total RU9	329	329	317	0	12	929	929	0
RU10	Special Projects								
	Program Direction	7	7	9	0	(2)	7	7	0
	Program Support	17	17	27	0	(10)	86	86	0
	Total RU10	24	24	36	0	(12)	93	93	0
Total Regulatory Unit									
	Program Direction	894	893	889	(1)	4	2,571	2,571	0
	Program Support	1,531	1,532	1,478	1	54	5,799	5,799	0
	Total RU	2,425	2,425	2,367	0	58	8,370	8,370	0

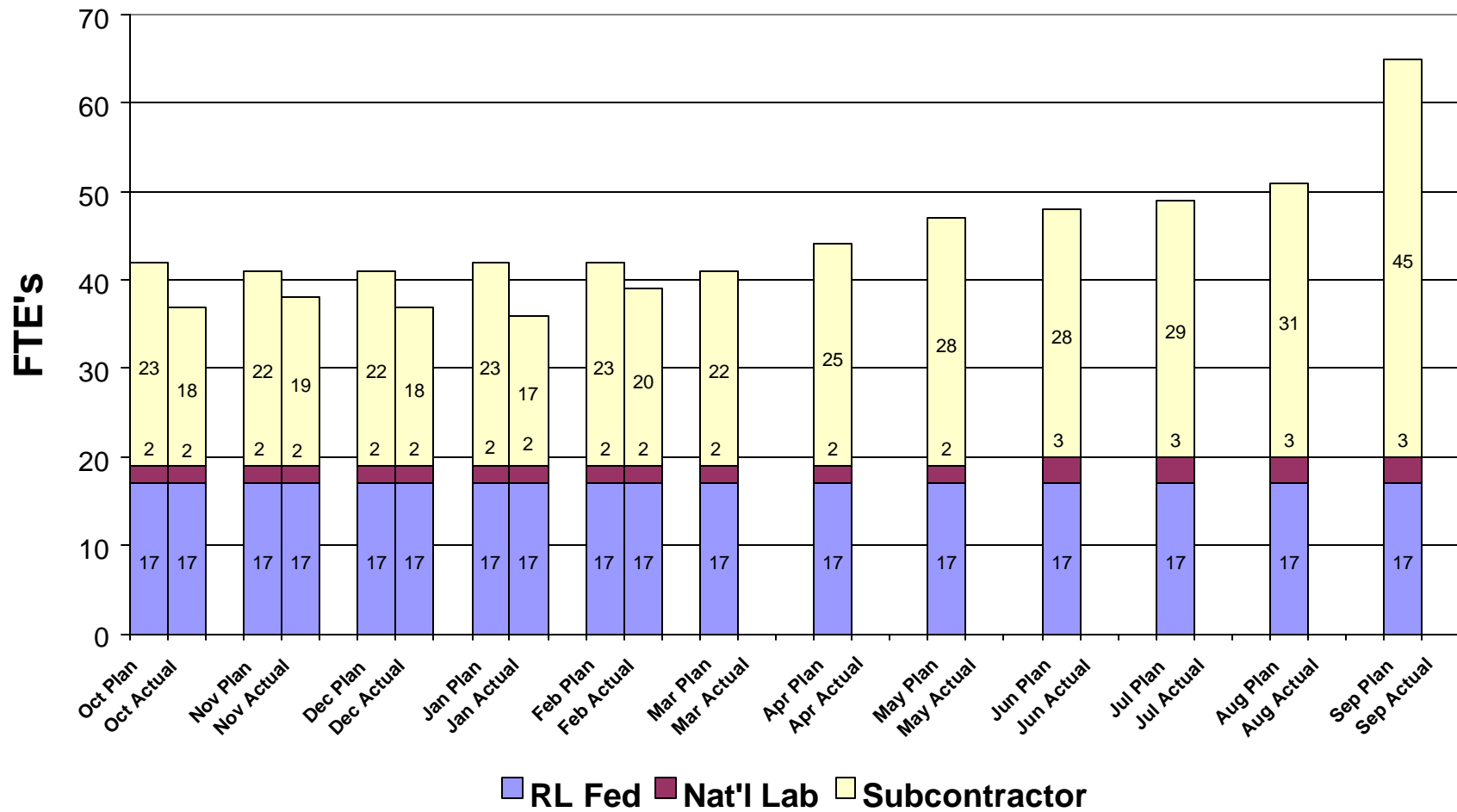
MILESTONE CONTROL LOG

<i>MILESTONE CONTROL LOG</i>							
<i>MILESTONE</i>		<i>WBS</i>	<i>MILESTONE DESCRIPTION</i>	<i>BASELINE COMPLETION DATE</i>	<i>SCHEDULE STATUS</i>	<i>FORECAST COMPLETION DATE</i>	<i>ACTUAL COMPLETION DATE</i>
<i>TYPE</i>	<i>NUMBER</i>						
<i>FISCAL YEAR 2000</i>							
RL	00-010	RU902	Standards Selection Inspection rpt issued	10/12/99	Complete	10/06/99	10/06/99
RL	00-011	RU902	Authorization Basis Inspection rpt issued	11/08/99	Complete	12/13/99	12/13/99
RL	00-012	RU902	Safety Integration Inspection rpt issued	12/07/99	Complete	12/03/99	12/03/99
FO	00-013	RU203	IH&S Plan issued	4/07/00	Behind	5/11/00	
FO	00-015	RU205	Revised Interface Plan issued	1/31/00	Complete	1/31/00	1/28/00
RL	00-016	RU902	Design Process Inspection rpt issued	2/14/00	Complete	2/14/00	2/08/00
RL	00-017	RU902	Employee Concerns Program Inspection rpt issued	3/13/00	Complete	3/13/00	3/10/00
RL	00-018	RU902	Training & Qualifications Inspection rpt issued	4/07/00	On Schedule	4/07/00	
RL	00-019	RU608	SAP Rvw Handbook issued	5/12/00	On Schedule	5/12/00	
RL	00-027	RU608	Initiate Review of SAP	5/15/00	On Schedule	5/16/00	
RL	00-020	RU605	LCA Rvw Handbook issued	5/17/00	On Schedule	5/17/00	
FO	00-004	RU502	ER & Approval of QAPIP Rev. 6 issued	7/19/00	On Schedule	6/09/00	
RL	00-014	RU902	Standards Implementation Inspection rpt issued	6/19/00	On Schedule	6/19/00	
RL	00-026	RU605	Initiate Review of LCA Request	6/26/00	On Schedule	6/26/00	
FO	00-002	RU204	Openness Plan Rev. 3 issued	6/30/00	On Schedule	6/30/00	
RL	00-021	RU902	QA Inspection rpt issued	7/17/00	On Schedule	7/17/00	
RL	00-022	RU602	CAR Rvw Handbook issued	6/09/00	On Schedule	7/21/00	
FO	00-023	RU502	Approval of RPP Rev. #3 issued	8/18/00	On Schedule	7/28/00	
RL	00-024	RU902	Corrective Actions Inspection rpt issued	5/30/00	On Schedule	8/11/00	
RL	00-025	RU902	ALARA Inspection rpt issued	9/11/00	On Schedule	9/11/00	

<i>MILESTONE CONTROL LOG</i>							
<i>MILESTONE</i>		<i>WBS</i>	<i>MILESTONE DESCRIPTION</i>	<i>BASELINE COMPLETION DATE</i>	<i>SCHEDULE STATUS</i>	<i>FORECAST COMPLETION DATE</i>	<i>ACTUAL COMPLETION DATE</i>
<i>TYPE</i>	<i>NUMBER</i>						
FO	00-003	RU102	FY 2001 PMP issued	9/29/00	On Schedule	9/29/00	

FULL-TIME EQUIVALENCY PROFILE (Graph)

Regulatory Unit FTE Profile



CHANGE CONTROL STATUS LOG

<i>Regulatory Unit FY 2000 Change Control Log</i>							
CIN#	Change Classified.	Author	WBS#	Date Change Originated	Change Request Explanation	CEB Review Date	CEB Disposition
00-001	I	K.D. Grindstaff	1.10	11/99	Processing of the FY 1999 Carryover into FY 2000 Baseline and Realignment of FY 2000 Cost Savings to Emergent Priority Workscope.	11/24/99	Approved
00-002	II	K.D. Grindstaff	1.10	12/99	Added new emergent workscope associated with impact risk balancing between TWRS and the TWRS-P facility.	12/03/99	Approved
00-003	III	K.D. Grindstaff	1.10	1/99	Redistributed funds associated with a task package titled Other Direct Cost (0424ODC).	01/18/00	Approved
00-004	II	K.D. Grindstaff	1.10	1/99	Renamed Cost Account RU1002 from K Basin SAR to Misc. RU Reg. Activities and separated the CAP into three tasks; K Basin SAR, RL Quality Assurance Program Plan, and WIPP Reg. Program Development.	01/20/00	Approved
00-005	I	K.D. Grindstaff	1.10	2/99	Implemented the most recent resource/activity planning effort, utilizing the Project's FYTD cost savings. Mid-year rebaselining effort.	02/25/00	Approved